

**UNITED STATES DISTRICT COURT FOR THE
FOR THE DISTRICT OF DELAWARE**

MITAS ENDUSTRI SANAYI TICARET A.S.	:	Civil Action No. _____
Plaintiff,	:	
v.	:	
VALMONT INDUSTRIES, INC.	:	
Defendant.	:	

**[PROPOSED] ORDER GRANTING PLAINTIFF’S
MOTION FOR LEAVE TO FILE UNDER SEAL**

The Court, having considered the parties’ submissions on Plaintiff Mitas Endustri Sanayi Ticaret A.S.’s (“**Mitas**”) Motion For Leave To File Under Seal (“**Motion**”) and having found sufficient grounds that the public disclosure of the confidential and proprietary information contained in Plaintiff’s Complaint, Plaintiff’s Motion for a Temporary Restraining Order and a Preliminary Injunction, Plaintiff’s Memorandum of Law In Support of its Motion for a Temporary Restraining Order and a Preliminary Injunction, and the supporting Declaration of Baris Karabag (“the **Pleadings**”) would result in irreparable harm to Plaintiff, **IT IS HEREBY ORDERED**, this ____ day of _____ 2020, that:

ORDERED that Plaintiff’s Motion is **GRANTED** and the Pleadings shall be SEALED;

IT IS FURTHER ORDERED that the above-listed documents shall be maintained under seal by the clerk of the Court.

United States District Court Judge